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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,)

10 Plaintiff,)

11 vs.)

12 ASHLEE M. MARTIN,)

13 Defendant.)

Case No.: 2:12-cr-00400-JAD-GWF

STIPULATION TO DISMISS
INDICTMENT
AND DISCHARGE FROM
PRE-TRIAL DIVERSION

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17 **IT IS HEREBY STIPULATED AND AGREED**, by and between the Defendant, Ashlee
18 M. MARTIN, by and through her attorney, CRAIG W. DRUMMOND, ESQ., and the United
19 States, by and through Daniel G. Bogden, United States Attorney, District of Nevada, and
20 Assistant United States Attorney, Steven W. Myhre, Attorneys for the United States, as follows:

21 1. On October 24, 2012, Defendant Martin was charged in a twenty-count Indictment
22 with Conspiracy to Commit Wire Fraud, Wire Fraud, Securities Fraud, Conspiracy to Commit
23 Money Laundering and Money Laundering.

24 2. On August 11, 2014, Defendant Martin entered a plea of guilty to Count One of
25 the Indictment pursuant to a Plea Agreement which stipulated that the government would dismiss
26 the Indictment against her provided that she successfully completed a 12-month period of pre-trial
27 diversion subject to terms and conditions specified therein.
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1 3. At the time she entered her plea, the Court set the matter for status at 9:00 a.m. on
2 August 17, 2015.

3 4. Since placement on pre-trial diversion, Defendant has maintained employment and
4 secured stable housing for her and her child.

5 5. Since January of 2014, Defendant has remained substance free and was
6 successfully discharged from co-occurring treatment in April 2015.

7 6. Defendant has complied with the terms and conditions of pretrial release and
8 successfully completed the pre-trial diversion period.

9 7. Ms. Sandra Bustos, Senior U.S. Pre-Trial Services Officer, has recommended that
10 Defendant Martin be successfully discharged from the program and dismissal of charges.

11 8. Based on the foregoing, the government concurs with the recommendation of the
12 Pre-Trial Services Officer and moves for dismissal of all Counts contain in the Indictment.
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1 **WHEREFORE**, the parties respectfully request that the Court accept their stipulation and
2 enter an Order discharging Defendant Martin from her pre-trial diversion program, releasing her
3 from all terms and conditions contained therein, dismissing all Counts in the Indictment against
4 her, and vacating the Status setting for August 17, 2015.

5
6 DATED this 13th day of August, 2015.

7
8 By: /s/ Craig W. Drummond
9 CRAIG W. DRUMMOND, ESQ.
10 228 S. Fourth Street, First Floor
11 Las Vegas, NV 89101
12 *Attorney for Defendant Martin*

13
14 DANIEL G. BOGDEN
15 United States Attorney

16 District of Nevada
17 By: /s/ Steven W. Myhre
18 STEVEN W. MYHRE
19 Assistant United States Attorney
20 Attorneys for the United States

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ASHLEE M. MARTIN,

Defendant.

Case No.: 2:12-cr-00400-JAD-GWF

ORDER

This matter coming on the parties' Stipulation, having considered the premises therein, and good cause showing, the Court finds as follows:

1. Defendant Martin entered into a pre-trial diversion agreement for a 12-month period as part of a Plea Agreement filed on August 11, 2014.

2. Since placement on pre-trial diversion, Defendant has maintained employment and secured stable housing for her and her child.

3. Since January of 2014, Defendant has remained substance free and was successfully discharged from co-occurring treatment in April 2015.

4. Defendant's pre-diversion termination date was August 11, 2015 and she has complied with the terms and conditions of pretrial release and successfully completed the diversion period.

5. Based on the foregoing and in accord with the recommendation of the Pre-Trial Services Officer, the government moves to dismiss all Counts contained in the Indictment against Defendant Martin.

6. Parties request the Status Hearing set for August 17, 2015 at 9:00 a.m. be vacated.

1 IT IS THEREFORE **ORDERED**:

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3 1. Defendant Ashlee M. Martin shall be, and is, discharged from her pre-trial
4 diversion program and is hereby **RELEASED** from all terms and conditions ordered therein;

5 2. The Indictment against Defendant Martin, and all counts contained therein, is
6 hereby **DISMISSED**;

7 3. The Status Hearing set for August 17, 2015 at 9:00 a.m. is hereby **VACATED**.
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9 **SO ORDERED**, this 13th day of August, 2015.

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11 
12 JENNIFER A. DORSEY
13 UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 13 day of August, 2015, the undersigned served the foregoing STIPULATION TO DISMISS INDICTMENT AND DISCHARGE FROM PRE-TRIAL DIVERSION on all counsel herein by causing a true copy thereof to be filed with the Clerk of Court using the CM/ECF system, which was served via electronic transmission by the Clerk of Court pursuant to local order.



Employee of DUMMOND LAW FIRM